

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

NORTHERN NEW MEXICO
STOCKMAN'S ASSOCIATION and
OTERO COUNTY CATTLEMAN'S
ASSOCIATION,

Petitioners,

v.

UNITED STATES FISH AND WILDLIFE
SERVICE and MARGARET EVERSON,
in her official capacity as Principal
Deputy Director of the United States
Fish and Wildlife Service,

Respondents.

Case No. 1:18-cv-01138-SCY-JFR

JOINT STATUS REPORT

On March 27, 2019, the Court issued a Scheduling Order requiring Respondents to serve a copy of the administrative record upon Petitioners, setting a deadline for Petitioners to communicate with Respondents regarding any concerns over the completeness of the record, and ordering the parties to file a joint status report by June 28, 2019, informing the Court of the outcome of those discussions. See Scheduling Order, ECF No. 12. The parties hereby notify the Court that they have resolved all disputes regarding the contents of the administrative record and agree that the administrative record is complete.

As provided in the Scheduling Order, Respondents shall lodge a copy of the certified administrative record with the Court no later than July 8, 2019. The parties will then proceed to summary judgment briefing in accordance with the briefing schedule established in the Scheduling Order.

Dated June 28, 2019.

Respectfully Submitted by,

JOHN C. ANDERSON
United States Attorney

MANUEL LUCERO
Assistant United States Attorney
P.O. Box 607
Albuquerque, NM 87103
(505) 224-1467
manny.lucero@usdoj.gov

JEAN E. WILLIAMS,
Deputy Assistant Attorney General
SETH M. BARSKY, Chief
MEREDITH L. FLAX, Assistant Chief

/s/ Devon Lea Flanagan
DEVON LEA FLANAGAN, Trial Attorney
DC Bar No. 1022195
U.S. Department of Justice
Environment & Natural Resources Division
Wildlife & Marine Resources Section
Ben Franklin Station, P.O. Box 7611
Washington, D.C. 20044-7611
Telephone: (202) 305-0201
Facsimile: (202) 305-0275
Email: devon.flanagan@usdoj.gov

Attorneys for Respondents

A. BLAIR DUNN
Western Agriculture, Resource and Business
Advocates, LLP
400 Gold Ave. SW, Suite 1000
Albuquerque, New Mexico 87102
Telephone: (505) 750-3060
Email: abdunn@ablairdunn-esq.com

s/ Damien M. Schiff

DAMIEN M. SCHIFF
JEFFREY W. MCCOY
ANTHONY L. FRANÇOIS
Pacific Legal Foundation
930 G Street
Sacramento, California 95814
Telephone: (916) 419-7111
Email: tfrancois@pacificlegal.org
Email: dschiff@pacificlegal.org
Email: jmccoy@pacificlegal.org

Attorneys for Petitioners and Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 28, 2019, I filed the foregoing motion electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

A. Blair Dunn
Attorney for Petitioners
abdunn@ablairdunn-esq.com

Damien M. Schiff
Attorney for Petitioners
Dms@pacificlegal.org

Jeffrey McCoy
Attorney for Petitioners
Jmccoy@pacificlegal.org

Anthony L. Francois
Attorney for Petitioners
Alf@pacificlegal.org

/s/ Devon Lea Flanagan

DEVON LEA FLANAGAN

Attorney for Respondents